

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Timothy J. Yoo (SBN 155531) Carmela T. Pagay (SBN 195603) Richard P. Steelman, Jr. (SBN 266449) LEVENE, NEALE, BENDER, YOO & BRILL L.L.P. 10250 Constellation Blvd. Ste. 1700 Los Angeles, CA 90067 Telephone: (310) 229-1234 Facsimile: (310) 229-1244 Email: tjy@lnbyb.com; ctp@lnbyb.com; rps@lnbyb.com <input type="checkbox"/> Plaintiff(s) appearing without attorney <input checked="" type="checkbox"/> Attorney for Plaintiff(s)	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION	
In re: THOMAS VINCENT GIRARDI, <div style="text-align: right;">Debtor(s).</div> JASON RUND, Chapter 7 Trustee for the bankruptcy estate of Thomas Vincent Girardi, <div style="text-align: right;">Plaintiff(s),</div> <div style="text-align: center;">vs.</div> G & L AVIATION, a California general partnership, <div style="text-align: right;">Defendant(s).</div>	CASE NO.: 2:20-bk-21020-BR CHAPTER: 7 ADVERSARY NO.: 2:21-ap-01028-BR REQUEST FOR CLERK TO ENTER DEFAULT UNDER LBR 7055-1(a) <div style="text-align: center;">[No Hearing Required]</div>

TO THE DEFENDANT, DEFENDANT'S ATTORNEY AND OTHER INTERESTED PARTIES:

1. Name of Defendant against whom default is sought (*specify name*): G & L AVIATION, a CA general partnership
2. Plaintiff filed the complaint in this adversary proceeding on (*specify date*): 02/26/2021
3. The summons and complaint were served on Defendant by ☐ Personal Service ☒ Mail Service
on the following date (*specify date*): 03/04/2021
4. A conformed copy of the executed service of summons form is attached hereto.
5. The time for filing an answer or other responsive pleading expired on (*specify date*): 04/01/2021
6. No answer or other responsive pleading has been filed or served by Defendant.

WHEREFORE, Plaintiff requests that the clerk of the court enter a default against this Defendant.

Date: 04/05/2021

/s/ Carmela T. Pagay
Signature
CARMELA T. PAGAY
Printed name of Plaintiff or attorney for Plaintiff

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

[illegible]

TO THE DEFENDANT(S): A Complaint has been filed by the Plaintiff against you. If you wish to defend against the Complaint, you must file with the court a written pleading in response to the Complaint. You must also serve a copy of your written response on the party shown in the upper left-hand corner of this page. The deadline to file and serve a written response is **04/01/2021**. If you do not timely file and serve the response, the court may enter a judgment by default against you for the relief demanded in the Complaint.

A status conference in the adversary proceeding commenced by the Complaint has been set for:

Date: May 11, 2021
Time: 10:00 AM
Hearing Judge: Barry Russell
Location: 255 E Temple St., Ctrrm 1668, Los Angeles, CA 90012

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AP-Summons Page 2 of 3

You must comply with LBR 7016–1, which requires you to file a joint status report and to appear at a status conference. All parties must read and comply with the rule, even if you are representing yourself. You must cooperate with the other parties in the case and file a joint status report with the court and serve it on the appropriate parties at least 14 days before a status conference. A court-approved joint status report form is available on the court's website (LBR form F 7016–1.STATUS.REPORT) with an attachment for additional parties if necessary (LBR form F 7016–1.STATUS.REPORT.ATTACH). If the other parties do not cooperate in filing a joint status report, you still must file with the court a unilateral status report and the accompanying required declaration instead of a joint status report 7 days before the status conference. **The court may fine you or impose other sanctions if you do not file a status report. The court may also fine you or impose other sanctions if you fail to appear at a status conference.**

KATHLEEN J. CAMPBELL
CLERK OF COURT

Date of Issuance of Summons and Notice of Status Conference in Adversary Proceeding: March 2, 2021

By: "s/" Stacey Fortier
Deputy Clerk



PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 10250 Constellation Boulevard, Suite 1700, Los Angeles, CA 90067

A true and correct copy of the foregoing documents **(1) Summons and Notice of Status Conference In Adversary Proceeding [LBR 7004-1]; (2) Verified First Amended Complaint to Quiet Title, For Turnover of Real Property, Notice of Required Compliance With Local Bankruptcy Rule 7026-1 (3) Adversary Cover Sheet** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On March 4, 2021, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

James J Finsten on behalf of Interested Party Courtesy NEF
jfinsten@lurie-zepeda.com, jimfinsten@hotmail.com

Carmela Pagay on behalf of Plaintiff JASON M RUND
ctp@lnbyb.com

Jason M Rund (TR)
trustee@srlawyers.com, jrund@ecf.axosfs.com

Richard P Steelman, Jr on behalf of Plaintiff JASON M RUND
rps@lnbyb.com, john@lnbyb.com

United States Trustee (LA)
ustpreion16.la.ecf@usdoj.gov

Timothy J Yoo on behalf of Plaintiff JASON M RUND
tjy@lnbyb.com

2. SERVED BY UNITED STATES MAIL: On March 4, 2021, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Walter John Lack, General Partner of G&L Aviation
Engstrom Lipscomb & Lack
10100 Santa Monica Blvd. 12th floor
Los Angeles, CA 90067-4107

Thomas Girardi, General Partner of G&L Aviation
100 Los Altos Drive
Pasadena, California 91105

Leonard Peña, Esq.
Peña & Soma, APC
402 South Marengo Ave., Suite B
Pasadena, California 91101
Attorney for Robert Girardi, Conservator of Thomas Girardi

Robert Girardi, Conservator of Thomas Girardi
3662 Aquarius Drive
Huntington Beach, CA 92649

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on March 4, 2021, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service by email information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

March 4, 2021

John Berwick

/s/ John Berwick

Date

Type Name

Signature

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
10250 Constellation Blvd., Suite 1700, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled (*specify*): **REQUEST FOR CLERK TO ENTER DEFAULT UNDER LBR 7055-1(a) AGAINST G & L AVIATION, A CALIFORNIA GENERAL PARTNERSHIP** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **April 5, 2021**, I checked the CM/ECF docket for this bankruptcy case and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- James J Finsten jfinsten@lurie-zepeda.com, jimfinsten@hotmail.com
- Carmela Pagay ctp@lnbyb.com
- Jason M Rund (TR) trustee@srlawyers.com, jrund@ecf.axosfs.com
- Richard P Steelman rps@lnbyb.com, john@lnbyb.com
- United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov
- Timothy J Yoo tjy@lnbyb.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) **April 5, 2021**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

IN ACCORDANCE WITH AMENDED GENERAL ORDER 20-12, THERE WILL BE NO MAILSERVICE TO THE COURT

Walter John Lack, General Partner of G&L Aviation
Engstrom Lipscomb & Lack
10100 Santa Monica Blvd. 12th floor
Los Angeles, CA 90067-4107

Attorney for Robert Girardi
Leonard Peña, Esq.
Peña & Soma, APC
402 South Marengo Ave., Suite B
Pasadena, California 91101

Thomas Girardi, General Partner of G&L Aviation
100 Los Altos Drive
Pasadena, California 91105

Robert Girardi, Conservator of Thomas Girardi
3662 Aquarius Drive
Huntington Beach, CA 92649

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 5, 2021 Megan Wertz

Date Printed Name

/s/ Megan Wertz

Signature